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U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

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**United States District Court**  
**For**  
**The District of Maryland**  
**Southern Division**

)

ARTHUR C. MORGAN )  
Plaintiff )  
Vs. ) Case No. 1GJH21cv1526  
ELIZABETH G. WRIGHT )  
Defendant )  
Elect for Jury Trial

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**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**  
(Non-Prisoner Complaint)

**1. Parties to the Complaint**

**A. The Plaintiff**

Arthur C. Morgan  
9622 Hagel Circle  
Lorton, Va. 22079  
571-334-5673  
a.morgan202052@gmail.com

**B. The Defendant**

1. Elizabeth G. Wright  
Assistant U.S. Attorney  
6500 Cherrywood La. , Suite 200  
Greenbelt, Md. 20770  
301- 344 - 0806  
elizabeth.wright2@usdoj.gov

Official Capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

- A. I am bringing suit against Federal Officials (A Bivens Claim)
- B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? - N/A
- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Plaintiff's 1st. Amendment rights have been violated due to the Government's decision to inhibit Plaintiff;s testimony and exhibits in a related criminal case where the Plaintiff is a defendant. The government has stated that any testimony related to plaintiff's past twenty eight year government service as a Confidential Information Asset has been deemed "classified" and may not be presented in the plaintiff's defense without their administrative permission.

Plaintiff's 4th amendment rights were violated due to The Search Warrant language that violated - FRCP-41(e)(2) - language that lacked the specified "Particularity" as required in the statute and resulted in vague and improper instruction, which led to the confiscation of items not associated with the related criminal case, and the destruction of personal property by the search agents. These actions occurred due to a misrepresentation of past historical facts and the creation of a false narrative created by AUSA Elizabeth G.

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Wright which instilled bias, prejudice and discrimination. The search agents acted in an excessive abusive manner and unprofessional behavior in their actions.

Plaintiff's 5th Amendment - confiscation of plaintiff's property without just compensation in a related criminal case.

Plaintiff's 6th Amendment rights have been violated by the Government actions of preventing witness testimony in favor of the Plaintiff in a related criminal case, who are retired F.B.I. Special Agents, and worked with the plaintiff for a period of over 16 years, by the Government's administrative action making the witness testimony as "classified" material.

Plaintiff's 5th and 8th amendment rights have been violated due to the actions of AUSA Elizabeth G. Wright is also responsible for presenting a collection of misrepresented past historical facts and creation of a false narrative to the court and pretrial services, in a related criminal case, where the Plaintiff is a defendant, AUSA Wright's actions instilled bias, prejudice, and discrimination with the Pretrial Service recommendations and the court ruling in regard to Plaintiff's Bail release conditions in which led to the Plaintiff's incarceration and increase of bail amount by the court without just cause. The court ruling was based on the bias, prejdice and discrimination, which violated due process, and failed in adhering to Bail Reform Act of 1987 -FRC-3142(c)(1) - amended version, Oct. 2005 - (18 U.S. Code- 3141-3150) - There was no factual evidence to support the punitive ruling and later imposed restricted release conditions. The Plaintiff is a

productive member of the community, he was neither a threat to the community nor a flight risk, in addition the charges against him were “White collar” and non violent.

Plaintiff’s 9th amendment rights have been violated, (other rights that have not been stated in the “Bill of Rights). Inhibiting plaintiff from gainful employment in the plaintiff’s profession as a security professional due to the A.U.S.A. Elizabeth G. Wright assault on the character of the Plaintiff, by the misrepresentation of past historical facts and the creation and propagation of a false narrative for the purpose of discrediting the Plaintiff and circumvent his due process and coerce the plaintiff into biased based plea bargain for a quick conviction in a related criminal case for further advancement in her professional career agenda. These actions were a violation of ABA and DOJ ethics standards and can be equated as slanderous and abuse of authority.

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed - N/A

### **III - Statement of Claim**

- A. Where did the events giving rise to your claims occur?
- B. What date and approximate time did the events giving rise to your claim(s) occur?
- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

(See Attached -Statement of Claim)

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**IV - Injuries - N/A**

**V - Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

**1** - Injunction against the original court order issued by Federal Magistrate Judge Gina I. Sims of the Bail restrictions of twenty four lock down to residence, drug testing and GPS monitoring until sentencing in the related criminal case.

**2** - Return of all confiscated property taken during the search warrant execution, with the exception of the firearms and body armor, but compensation for their loss. (see attached confiscated property sheets)

**3** - Compensation for the damage to residence and other personal property and loss of personal property. (see attached confiscated property sheets)

Damage to Attic at Lorton residence estimated at \$ 2,429.00

Confiscated property from Lorton Residence estimated at \$ 11,490.75

Confiscated property from Springfield warehouse estimated at \$117,250.00

Confiscated and damaged property from Dickerson Storage, Mineral, Virginia estimated at - \$ 11,920.00

Confiscated and damaged property from 4448 Mt. Airy Rd., Louisa Virginia estimated value - \$ 1,412.2

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**4** - Compensation for loss of business and employment. Loss of plaintiff's business which was forced to be closed by the actions initiated by AUSA Elizabeth G. Wright without due process (see attached S.E.G. Business worth) Estimated at \$ 399,821.00 USD

**5** - Recommend an administrative DOJ reprimand for AUSA Elizabeth G. Wright for her unethical and unprofessional behavior, but also initiate an administrative investigation and review and reform of the United States Attorney's Office, nationwide. Under the standards of 3-1.2 - Functions and Duties of the Prosecutor established by the American Bar Association states, "The primary duty of the prosecutor is to seek justice within the bounds of the law, not merely to convict." AUSA Elizabeth G. Wright's behavior violated this standard and the DOJ "Standard of ethics". Unfortunately AUSA Wright's actions are not the exception to the rule, but have eroded into an acceptable policy among many federal and state prosecutors which have resulted in violations of the defendant's civil rights and due process. When an institution of justice allows its members to abuse their authority, politicise the office for personal gain, and embrace bias, prejudice and discrimination in their actions, then the institution has sacrificed its credibility, integrity and respect to protect an projected image of hypocrasy.

**6** - Present recommendations for administrative policy and procedure reforms within the U.S. Federal Probation and Pretrial Services. There exist a unhealthy culture of bias, prejudice, and discrimination that results in a institutional abuse of authority, and emplementation of policies of excive punitive actions without just cause against individuals under their supervision. Federal Pretrial Officers have the responsibility of presenting recommendations for bail and or release to the court in regard to a defendant's status. In many situations their recommendations

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are based on their personal beliefs and bias and not in accordance with the “rule of law”. It is paramount for the integrity of the court and the criminal justice system that their recommendations are presented in accordance with the 18 U.S.C. § 3142(b) Bail Reform Act. and not some personal prejudice or bias nor the recommendations presented by the government.

7 - Present recommendations for the Department of Justice to implement diversity training, psychological screening programs and re-emphasis on ethics and code of conduct for federal prosecutors to embrace to combat the current culture of bias, prejudice, class and race discrimination currently in practice by some of the members of the Federal criminal justice system.

## VI. Certification and Closing

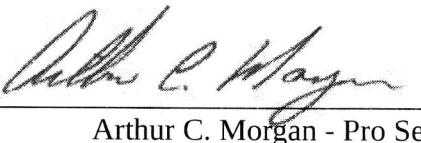
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk’s Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk’s Office may result in the dismissal of my case.

Date of signing 06/ 16 /2021

Signature of Plaintiff



Arthur C. Morgan - Pro Se

### **Statement of Claim**

In our current climate of exposing the misconduct of rogue members of law enforcement, there is another area of the criminal justice system that is not getting the same level of attention, but is in dire need of investigation, exposure and reform. There are jurists, U.S Prosecutors, Magistrates, Pretrial Officers and Judges who exercise almost absolute authority over individuals who have the misfortune of being subjects of the criminal justice system, who's civil rights are being institutionally violated on a regular basis, in ways where there is no recourse or protection available due to Absolute Privilege which offers a even higher level of protection to jurists than Qualified Immunity. It allows prosecutors to make defamatory, material false and misleading statements against a defendant for the sole purpose of attacking their character, which instills bias, discrimination and prejudice amoung other jurists and members of the criminal justice system, which has a direct negative effect on recommendations and rulings imposed by the court.

I have experienced this phenomena first hand, I have been a career security professional, operating my own company, with over 28 years of service, as a private investigator, military security contractor, and Technical Surveillance Countermeasure Specialist, (TSCM). My past clients include law enforcement, military and government agencies. I have been a respected member of the community and recognized as a distinguished member of my profession. I am also an x-offender, convicted felon who served hard time for second degree murder, and RICO violations from 1982-1988.

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I predict that your initial response would be, "How is this possible?". The explanation is even more incredible, but true. In my early years of being associated with organized crime, I was a "enforcer" and "fixer". I successfully protected the operations of the organization for over a seven year period from local government and law enforcement by employing surveillance and countersurveillance tactics. A few years after my release in 1988, I was recruited and worked for a New York Security Company (C.C.S. / S.T.G.) as a "Security Consultant" and became the manager for the Washington D.C. field office. We specialized in electronic investigative / surveillance security products and countermeasures. I developed an extensive foreign embassy and government clientele. My activities came to the attention of the F.B.I. Counter-Intelligence Office in December of 1992. This was the beginning of my 26 year career of service as a confidential Intelligence Asset. I was provided support in transforming my security consulting company (Surveillance Equipment Group Inc. / S.E.G. Inc.) to be a licensed security company in Virginia. My company acquired a Federal Firearms License for 1994-1996, to support specific work related activity, and I was a registered Armed Security Office for the year 2005. I also established long term "working relationships" with other Law enforcement and Intelligence Agencies, and am still in good standing with the individual retired members of those Agencies.

After 911, and the initiation of the Iraq and Afghanistan conflict there was an increased demand for body armor products. In November of 2007, I had a discussion with a mutual friend and associate who was a member of the Ft. Bragg "special forces" community. He informed me that the current U.S. Army issue "V-50" (NIJ Level IIIA) soft armor vests were not effective against the Russian Tokarev, military 7.62 x 25 mm. Pistol, which was a standard sidearm for the Iraqis militias. This was informally further verified by other armed service members. This

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motivated me to research a solution and establish our own brand of body armor, at the same time. I developed a relationship with an American Chinese contact, Mr. (Sam) Jian Chen who became my friend and financial partner. I shared this issue with Mr. (Sam) Jian Chen and he responded that Chinese manufactured body armor was effective against the Russian Tokarev, because Chinese armament was identical to Russian armament and their body armor was designed to offer protection from their own light weaponry. Mr. (Sam) Jian Chen introduced me to Chinese manufactures and government officials that were involved with the production of body armor and helmets. I procured samples and sent them to my Ft. Bragg Special Forces contacts for testing. I was informed the samples passed ballistic testing and were effective in defeating the 7.62 x 25 mm. cartridge. I then traveled to China several times with Mr. (Sam) Jian Chen, to establish an OEM relationship to manufacture a SEG Armor product line. My motive was two fold, first, I needed to have a legitimate reason to network with Chineses government officials to gain access to various security technologies and develop in-country contacts. Secondly, I wanted to offer the U.S. forces in Iraq and Afghanistan a protective product that would defeat light Russian weaponry. I started supplying the armor products under our own brand (S.E.G. Armor) to government clients through our GSA contract. I was aware that China was not a TAA compliant nation and their products should not be sold to the U.S. Government clients, but I felt it was more important to provide a product to our troops that was effective against the light enemy fire. My long term goal was to reverse engineer and transition the manufacturing to be U.S. made in Louisa, Virginia, where I had a long term intention to build a factory.

My life and career came to an abrupt halt on early Tuesday morning of December 17th 2019. I was arrested in my home at 6 AM, for “Bank Wire Fraud”. The arrest was violent and

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the escalated use of force had no justification. Although there were firearms secured in my upstairs home office closet, I was unarmed and never presented myself as a threat. I was treated like foreign military combatant. I was handcuffed and shackled and then thrown to the ground just for a show of force and intimidation.

My initial appearance at Federal District Court Greenbelt was another shock to my senses. I was expecting to be allowed bail pursuant to the Bail Reform Act of 1987 and amended version of October, 2005. (18 U.S. Code 3141 -3150) . I was neither a flight risk nor a threat to the community.

A.U.S.A. Elizabeth G. Wright presented an intense “false narrative” to Federal District Magistrate Judge Gina I. Sims, which included defamatory and a very distorted view of my 40 year old past criminal history. She misrepresented facts and made several material false statements that were a direct assault against my character. A.U.S.A. Wright further falsely accused me of being a flight risk due to my past extensive foreign travel (I have traveled to over 50 foreign countries, many of the travels were work related to my government Informational Asset service activity). She falsely stated that I was involved in operating a criminal enterprise, and accused me of “Obstructing Justice” by attempting to destroy evidence, claiming that my attempt to complete delivery on a legitimate order - Riot Gear intended to be delivered to the Mexican prison system was an act of intentional destruction of evidence. She falsely accused me of government witness intimidation, Mr. Paul Cabrera, a long time friend and employee of my company. A.U.S.A. Wright also falsely claimed that I intimidated and threatened my wife, which was an inference that my wife would be unacceptable as a custodian, if I were to be released.

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A.U.S.A. Elizabeth G. Wright was fanatically fixated on my past 40 year old criminal history, she demonstrated implicit bias, prejudice, and discrimination, which had a direct and negative influence on Magistrate Simms's rulings regarding my possible release . A.U.S.A. Wright's behavior was dogmatic, zealous, and fanatical. She made these presentations to the court without any factual substantiation to support the acquisitions. I later learned that A.U.S.A. Wright went to great extent to notify all of my government clients, including GSA and the Virginia Dept. of Criminal Justice (DCJS) of my arrest. (This was done with the intent to have my certifications and security company license and government contracts revoked.) Please note, at the time she initiated these actions, I had not been convicted of any crime. I viewed these acts as a further effort to circumvent my due process and civil rights and inhibit me from any gainful employment.

A.U.S.A. Wright's actions caused a chain of confirmation bias actions that created a "Catch 22" scenario. Federal District Magistrate Judge Simms initially approved a \$75,000.00 property Bond but Pretrial U.S.P.O. Leigh A. Messett stated to the Court that my wife, (a medical professional with no criminal record) was not fit as a "Custodian Agent" because "she worked too many hours", even though she worked a normal 40 hour week from 6AM- 3PM. The PreTrial recommendation was autocratic and reflected the same defamatory implicit bias and prejudice initiated by A.U.S.A. Wright. I was at a loss to understand their collective bias and prejudice behavior. I was remanded to D.C. jail.

My charge of one count of "Bank Wire Fraud", a "white collar crime". I am a 68 year old man with a 30 year career as a security professional, with no major arrest or convictions for the

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past 40 years. I had established ties to the community and was a property owner, and I posed no threat to the community and functioned as a law abiding citizen with close working relationships with military and law enforcement. All of what I stated can be collaborated with defense exhibits for the related criminal case.

It was evident that Agents who were involved with my investigation and arrest embraced the same biased and prejudiced behavior generated from A.U.S.A. Wright's false narrative, again they focused on my past 40 year old criminal history. They demonstrated fanatical tunnel vision and totally ignored any evidence that didn't support their biased perspective. On the day of my arrest my wife was interviewed by one of the young FBI agents, He said to her, "Did you know that your husband killed someone?" He behaved as if I had just committed the act. My wife was very surprised at his actions. He then inquired if she had a criminal record? (She does not) They collectively embraced a misconceived false narrative. If GSA-IG-S.A. Rudolph (Agent in charge) or any other government investigating agent had approached me directly and informed me of the charges, I would have fully cooperated and accepted the consequences and saved taxpayer dollars from being wasted needlessly in pursuit of their misguided agenda. All of these actions on their part demonstrate violations of my 5th and 8th and 9th amendment (violation of due process due to bias and prejudice demonstrated by the federal agents and the collective negative actions presented during the bail hearing, including the slanderous and false statements of A.U.S.A. Wright.

In addition to my arrest there were search warrants executed on my home and three other locations. The language of the "Search Warrants" was intentionally vague and lacked the

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required specific "Particularity" as required as stated in FRCP-41(e)(2). The documents were full of generalizations which lack "probable cause". This generalization encouraged the Search Agents to confiscate items that were not relevant to the criminal complaint. Their entire search activity was excessive and destructive. These actions violated my 4th amendment rights.

Location (1) 9622 Hagel Circle, Lorton, Va. 22079 - Family residence which is titled in my wife's name. Our home was left in total disarray. Agents searched the entire house, including our bedroom, even the attic floor insulation was torn up. They confiscated everything from blank check books to past year income tax return documents, trade show samples. Many of the items had no correlation to the Search Warrant descriptions. There were 4 firearms confiscated; 2 pistols, and 1 shotgun taken from my second floor home office closet. There was a revolver in the bedroom closet that belonged to my wife. (All of these weapons were acquired over 25 years ago, when my company had a legitimate FFL license.). There was a small amount of marajuana confiscated, which I used to treat my PTSD. The insulation in our attic was totally torn up and the attic separation wall between our dwelling and the adjourning residence were broken open. In an effort to recover a firearms accessory part that was not listed on the Search Warrant. The Search Agents left our residence damaged and in disarray. (see attached confiscated items list)

Location (2) -, 7701 Southern Dr., Suite R, Springfield, Virginia 22150 - Storage unit # D7 (850 sq. ft.), Single Storage unit in a multi-space warehouse. We temporarily had stored 35 pallets of non ballistic Anti-Riot gear, 377 Riot suits, 353 Riot Helmets, 152 Riot Shields, 69 Duty Belts, 126 Tactical Transport Bags intended to be shipped to Laredo Texas for a State Dept INL contract, valued over \$120,000.00. The End User was the Mexican Prison System. All of

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my financial resources were invested in this contract. The Search Agents announced a "Bomb Threat" to clear the other tenants from the facility. (This can be calibrated, with Mr. Paul Cabrera's statement, and other tenants) The Search Agents violated the civil rights of other innocent individuals for their own agenda. Here again reflects autocratic excessive unprofessional behavior, which should be prohibited as to how a federal agent should conduct their affairs. (See attached confiscated items list)

Location (3) - 5072 Zachary Taylor Hwy. unit 411, Mineral Virginia 23117 - 10 x 20 storage garage. Search Agents broke a 24" x 48" glass table top, damaged classic LP album collection LP Vinyl record collection approx. 120 records - 1950 and 1970 collection. They confiscated Pelican transport case with trade show display posters and a (non-working) demo of a cellular intercept monitoring system, personal records and license plate recognition cameras. See Search Warrant Inventory (highlighted). Not listed on the Search Warrant Inventory are the following items missing a 500 year-old 5-panel antique Chinese screen with gold leaf inlay (front) and ebony inlay with stones (rear), 14" x 72"; a non-working demo of a cell intercept monitoring system with 2 patch antennas and trade show display, 120" x 72", a non-working demo of a Search and Rescue GSM Tracking unit, a black wheeled tool box with technician's tools, a 2-tier tool box with tools; and, a 32" flat screen color monitor. None of these items were associated with items listed on the search warrant. (see attached confiscated list)

Location (4) - 4448 Mt. Airy Rd., Louisa, Va. 23093 - 11 acre land parcel in my wife's name with a 17' travel trailer, minivan, bulldozer and Chevy Pickup truck . The Search Agent forced entry into the 17' travel trailer, which was a former residence of Mr. Paul Cabrera, a

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company employee. They confiscated ammunition and personal property that belonged to Mr. Paul Cabrera. They also confiscated a dash camera and dome security camera. In addition 1- Black Ballistic Helmet -w/ 7 pads, head strap, -Level IIIA was in the back seat of the pickup truck registered to Mr. Paul Cabrera, by breaking the side passenger window of the Pickup truck. This is the same helmet that is listed on the confiscation sheet. (See attached confiscated item list)

The legal arguments are documented in a “Motion for return of Property Pursuant to Rule 41(g) of The Federal Rules of Criminal Procedure” in the related criminal case. These are violations of 4th amendment conducting searches in violation of FRCP-41(e)(2) the “Search Warrants” was intentionally vague and lacked the required specific “Particularity” as required, and 5th Amendment - confiscation of property without just compensation.

The case investigation initiated by GSA-IG- S.A. Richard Rudolf in April of 2018 had several inconsistencies GSA-IG- S.A. Rudolf stated in his criminal complaint that his investigation was the result of another “Law Enforcement” investigation that was initiated on May 17th, 2016. He doesn’t elaborate to present any material facts, related to the nature of the 2016 investigation nor does he identify the specific agency involved. He then claimed that he acquired sample helmets that were part of a U.S. Navy FMS contract N0017415F0062 which was completed and delivered in February 2015 and shipped to Pakistan. GSA-IG- S.A. Rudolf claimed that the sample helmets that he inspected had chinese markings inside the shell. The photographs that I examined do have the same characteristics of a military issue Advanced Combat helmet (ACH) with the SEG Armor label, but there was no “Chain of Custody”

associated with the presented evidence to verify that the “sample helmet” was one of the units from the original contract three years earlier. If the Chinese markings were discovered during the original inspection after the shipment was received, why did the government ( U.S. Navy) wait three years for GSA-IG- S.A. Rudolf’s 2018 investigation? In review of the criminal complaint, the majority of the language was focused on establishing GSA-IG-S.A. Rudolph’s background and credentials as a “fraud investigator”. He presented this as his foundation for viewing me as a suspect. The 19 months of investigation and surveillance that was conducted against me, prior to my arrest, as revealed in the “Discovery evidence”, was conducted at a taxpayer cost of over an estimated \$1,500,000.00 USD. The total sale price of all of the body armor contracts combined that were subject to the investigation was less than \$ 660,000.00 U.S.D. This is a further reflection of a mindset lacking common sense with a instilled bias and prejudice agenda that resulted in a needless misuse and waste of government resources.

A.U.S.A. Wright’s persistence in presenting her false narrative of my background and character resulted in me being remanded to custody at D.C. Jail until 04/03/2020. On 04/03/2020 U.S. Federal Magistrate Judge approved an increased bail to \$100,000.00 U.S.D ( Property Bond - requiring the pledge of the family residence and the 11 acre property in Louisa ,Virginia) without any explanation for the increased amount. My wife secured the bond, the release was due to a continued effort by my F.P.D.O. Attorney arguing COVID-19 concerns. I was restricted to a “house arrest” 24 hour lockdown with electronic monitoring and periodic drug testing. This order was presented without any just cause. The electronic monitoring method presented by U.S.P.O. Pretrial Services was a software application that they insisted to be installed on my wife’s cell phone. (This is an infringement on my wife’s civil rights.) On 04/01/2020- Approx. 11

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AM - U.S.P.O. Pretrial Officer Eric Finney Frick called my wife and informed that she would be required to surrender her cell phone to me upon my release as a required condition and would she agree to this condition? My wife responded to U.S.P.O. Pretrial Officer Frick that she was at work, dispensing medication and couldn't engage in a long conversation. (She is a medical technician at an assisted living facility in Arlington Virginia). U.S.P.O. Pretrial Officer Frick acted indifferent to her request and informed her that he required an immediate answer, as his supervisor was requiring an immediate answer. My wife acknowledged and agreed to the condition under duress, because there was a non verbal inference conveyed that I would not be released unless she complied.

On 04/02/2020 U.S. Asst. Attorney Wright appealed the decision ,but was overruled. On Friday 04/03/2020, the morning of my release, U.S.P.O. Pretrial Officer Frick called my wife and informed her that I was being released from the Baltimore Federal Courthouse, and she needed to go there and pick me up. My wife was already at work, she explained she couldn't leave her duties without advance notice. It was finally agreed after my attorney became involved with the dialogue that I could travel via cab to my residence. U.S.P.O. Pretrial Officer Frick then impatiently insisted that my wife had to surrender her cell phone to me on my arrival home. My wife responded that she needed her cell phone for work and her own personal use. U.S.P.O. Pretrial Officer Frick responded, "You agreed to do it when we spoke yesterday". My wife then inquired if Pretrial Service could provide a cell phone, if it was that urgent? U.S.P.O. Pretrial Officer Frick replied "yes we can if necessary, but you agreed that you would surrender your phone." My wife replied that she would, but it would be temporary, because she needs her phone for her own communication needs. U.S.P.O. Pretrial Officer Frick acknowledged but made no

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response to offer a cell phone. My wife met me at our residence at approximately 12 PM, she was able to leave work after she completed dispensing medication. She gave me her cell phone and she returned to work. I called U.S.P.O. Pretrial Officer Leigh A. Messett per my release instructions. She was to assist with the installation of the BI-Link Application Tracking link. U.S.P.O. Pretrial Officer Messett's demeanor was abrasive and autocratic, she behaved as if my home detention personally bothered her. I encountered some technical issues with the installation process, and she accused me of not cooperating and threatened to violate me. The BI Link phone application was designed with very intrusive and annoying features. It would generate 4 to 5 notifications per day from 5 AM to 2 AM in the night. On each notification I was required to take a selfie photo at the time of the notification, even though I was in my home. If I didn't respond immediately, it was considered a violation. The next day (Saturday) my wife purchased me a cell phone. I uninstalled the BI-Link application from my wife's phone and installed the application on my new phone. (My cell phone had been confiscated during the execution of the Search Warrant).

There were several incidents where I didn't respond immediately to the "check in", either because I was on the phone (the notification feature malfunctioned when the phone was in use) or was in the shower. Once I was in my home, I was under the misimpression that I could perform limited tasks, such as walk the dog and assist my wife with carrying groceries or taking out the trash. U.S.P.O. Pretrial Officer Messett surveilled my home from the parking lot for several weeks upon my release. She video taped me walking my dog, taking out the trash, and helping my wife take in the groceries for the sole purpose of violating me. U.S.P.O. Pretrial Officer Vakida Wilson (who was my primary officer) and U.S.P.O. Pretrial Officer Leigh A.

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Messett immediately filed negative reports to have me violated, fortunately, Magistrate Sims did not rule in their favor. I was informed in very threatening terms by U.S.P.O. Pretrial Officer Messett that I was prohibited from performing these very basic tasks. This type of petty behavior and oppressive restrictions served no purpose except to place additional burdens on my wife, demonstrate an abuse of authority and impose needless excessive punitive enforcement, which further demonstrated the implicit bias, prejudice, and discrimination, initiated by A.U.S.A. Wright. Here is an interesting observation, all of my past criminal activity occurred before she was even born!

There is another motive for Pretrial Services use of the BI-Link Tracking/Monitoring Cell Phone Application. This product has surreptitious features that can monitor and record phone calls, social media communications, and SMS text messaging. I am familiar with BI-Link products and support services because I had several discussions with their engineering department several years earlier at the NATIA (National Association of Technical Investigators) Security Trade Show. We had an interest in integrating their product into our cellular intercept monitoring system. The application has two modes, the overt mode ,where you know it is installed on the cell phone and covert mode where it's still monitoring cell phone activity without your knowledge. Pretrial Services wanted my wife's consent as a requirement to install the application on her phone so they could monitor the cell activity of her phone without a warrant. This is clearly a 4th amendment violation and another example of why there is a dire need for reform of some of the policies and activities of the federal criminal justice system.

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On 04 / 23 / 2020 - A.U.S.A. Wright, issued a subpoena to my daughter of Newport Beach, California to force her to surrender letters that I had written to her during my incarceration. I wrote to my daughter letters, explaining my case and asking for her support to circulate case information in an effort to secure additional legal support in defending myself. A.U.S.A. Wright wanted to examine the letters, for potential information that could be used against me. She performed a similar action to a long time friend and associate, Lt. Col. Michael Janay- U.S.M.C., retired of Bristow, Virginia. She sent Agents to his home to interview him and with the threat of subpoena, if he didn't surrender the letters I had written to him during my incarceration. She also demanded a copy of the character reference letter that he wrote on my behalf and had sent to my attorney. These actions may be legal but reflect a sociopathic mindset, excessive pettiness and abuse of authority that demonstrate a lack of ethics and professionalism.

A.U.S.A. Wright wasn't satisfied with the single count of "Bank Wire Fraud" and she didn't have the authority to charge me with firearms possession due to jurisdiction. She contacted A.U.S.A. Benjamin E. Kringer and requested his support to initiate additional charges against me for firearms possession. On June 26th, 2020, I was formally charged with firearms possession in the Alexandria Virginia Federal District Court. I surrendered myself on Monday 06/29/2020 to U.S. Marshalls at the Alexandria Federal Courthouse. I had my initial appearance at 13:00 hours (1 PM), A.U.S.A. Benjamin E. Kringer aggressively argued for my incarceration, again without any just cause. He presented the same unsubstantiated claims that A.U.S.A. Wright previously presented, he falsely argued that I had violated my home confinement, without any evidence. Federal District Magistrate Judge Michael S. Nachmanoff (the same Federal Magistrate Judge who signed the Search Warrant for my Springfield warehouse and my Lorton residence) ordered

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a formal hearing. I was remanded to the Alexandria City jail. The formal hearing was the following day, 06/30/2020, during the formal hearing GSA-IG-S.A. Radwick (One of the investigating GSA-IG Agents) testified as a government witness and presented several false and misleading statements to the Court. He stated that S.E.G. Inc. (my company) never possessed a FFL license. He also exaggerated the amount of ammunition confiscated during the execution of the search warrant, claiming that over 800 rounds of ammunition was confiscated. The most revealing statement he made was that the BI-Link application had been monitoring all of my cell phone communication and was providing data to him and the U.S.P.O. Pretrial Office, without a warrant. The Virginia Court upheld the Maryland Release Order with some changes, A.U.S.A. Kringer insisted that my electronic monitoring should be changed from a phone application to an actual GPS electronic ankle bracelet monitoring unit. The modification was approved and I was released to return home and continue my house 24 lockdown detention. The GPS ankle bracelet tracker was an improvement. I no longer had to perform the 4 to 5 per day self-checkins, which was a relief, I'm sure that my phone was still being monitored even though I uninstalled the BI-Link application from my phone.

### **Electronic Surveillance Tracking**

BI Incorporated a GEO Group company of Boulder Colorado is the exclusive contractor for providing the BI-Link tracking product line of various types of electronic monitoring technologies. The Federal District Courts force detainees to submit to electronic tracking surveillance technology as a condition of release regardless of the circumstances of their case. This has become a standard practice for the majority of released detainees. This policy is a direct violation of The 1987 Bail Reform Act under 18 U.S.C. § 3142(b). In addition the detainee is

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responsible for the monthly monitoring cost, if they are employed. BI -Smart Link GPS tracking - \$4.00 per day - (\$120.00 per month) BI-Smart-Link Cell phone App - \$0.60 per day - (\$18.00 per month). This is billed directly to the detainee on a monthly basis.

"Qui Pro Domina Justitia Sequitur" (Latin: "Who prosecutes on behalf of justice, or the Lady Justice ") is the motto of the Department of Justice. The duty of a prosecutor is to pursue justice by seeking the truth and verifying facts when investigating criminal acts. Unfortunately there lurks a cancer within the criminal justice system, where it has become accepted practice for prosecutors to politicize the office, view defendants as inferior objects to manipulate, to defame, misrepresent facts, make material false statements, and attack the character of a person. These actions all in an effort to circumvent a defendant's due process and civil rights for the sole purpose of a quick plea agreement and conviction for the prosecutor's self enhancement. This behavior violates the code of ethics, the rule of law, and is an assault on the collective integrity of the institution of justice.

It is a tactic that I am quite familiar with, it is practiced in psychological warfare (psy-ops). There is a “subject of interest” who you wish to discredit, a false narrative is created and it is repeated to the public and media, repeatedly to such an extent that people come to believe it. Our previous president Donald J. Trump was a prolific practitioner of these tactics in his promotion of the “Big Lie” (that the Presidency was stolen from him). A.U.S.A. Elizabeth G Wright is also a practitioner of these same tactics. She created a false narrative to discredit my character, which supported a self empowerment agenda, she deliberately made efforts to inhibit my right to due process. Any facts that counter her narrative, she made efforts to suppress them.

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It is also unfortunate that Ms. Wright's superior, Acting United States Attorney Jonathan F. Lenzner supported her actions without question or concern. There is a further irony, she cannot be sued for libel because of the protection of "Absolute Privilege". (I wrote an article on the subject for my social psychology course and submitted it to the American Constitutional Society)

A.U.S.A. Wright's fanatical behavior forced me to break a confidential relationship that I have had with the FBI Counterintelligence office for over 25 years, I was forced to reveal my relationship in defense of my character. Two of my past FBI "Handlers", retired, S.A. Gene McColland and S.A. Mike White agreed to provide testimony on my behalf as a character witness in an effort to counter A.U.S.A. Wright's "false narrative". A.U.S.A. Wright made an attempt to suppress this testimony. This is a violation of my 6th amendment - inhibiting a defense witness from testifying. My attorney was required to submit a "Touhy Request "to the FBI, for S.A. Gene McColland, (retired) to be allowed to testify. AUSA Elizabeth G. Wright protested Mr..McColland's testimony, her action resulted in the FBI to deem all of the exhibits submitted to the court to be treated "as classified" and all the government servers must be "cleaned" and all future submissions must be approved by the FBI before they can be presented as Defense evidence exhibits. This also is a violation of my 6th amendment - inhibiting a defense witness from testifying, by "classifying" the statements of testimony, with possible refusal of being able to use those statements in defense of a criminal case is a further act of testimony suppression. The fact that I was forced to expose my past 25 years of confidential patriotic service to defend my character, in an attempt to counter the extreme false narrative generated by A.U.S.A. Wright, reflects a campaign of persecution, not prosecution. A.U.S.A. Wright's continued efforts to inhibit my former FBI handlers from offering testimony on my behalf

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resulted in the revocation of Mr. Mike White's security clearance. He has been working as a contract security consultant working on classified projects. (Here is another example of abuse of authority.)

There is a fine line between cops and criminals. It may surprise you that I worked from 1998 until December 2019 for MPD -Internal Affairs Technical Surveillance Unit (TSU) under contract as their "Surveillance Equipment Consultant "and during that time I had first hand observation of police misconduct.

My crime in the related criminal case is OEM manufacturing body armor products in a non TAA compliant nation and misrepresenting the country of origin with the labeling and documentation. The government interrupted my actions as "Bank Wire Fraud" - 18 U.S.C. § 1343, with a penalty of not more than 20 years imprisonment/\$250,000 fine or twice the gross gain/loss, whichever is greater (Class C Felony).

It should be noted that all of the body armor and helmets that were supplied to U.S. government clients, where payment was received, the items were accepted and used. The items met all ballistic testing standards, and were of a high quality standard. There was no evidence of overcharging the government, all pricing was competitive. There was never an actual loss to the government clients. There are Defense Exhibits available to substantiate this.

AUSA Wright went to the extent of contacting all of the agencies who purchased the S.E.G. Armor, and informed them that they must remove the items from their inventory, on the

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claim that they were not TAA compliant to further substantiate her claim that the government suffered a loss. All of the contracts that were completed where products were delivered and accepted and paid in full, met all ballistic protection standards, and they were placed into use for more than 3 - 5 years prior to the related criminal case.

The "One Time Supply Contracts" for Body Armor and Helmets awarded to S.E.G. Inc. represented less than 20% of the company's core work activity. It is apparent that prosecution of this crime has been selective and subjective, other violators of similar and or larger volume received civil fines in lieu of criminal prosecution. In comparison to other large corporations who engaged in similar conduct on a larger scale routinely received civil fines. (See below)

2000 - Lockheed Martin - The U.S. State Department charged Lockheed Martin (formerly Martin Marietta Astro Space) with violating the Arms Export Control Act and the International Traffic in Arms Regulation when it provided technical assistance to Chinese space launch vehicle firms in 1994. Lockheed settled the case, agreeing to pay a civil penalty of \$13 million (\$5 million of which was suspended but applied toward the cost of remedial compliance measures).

2004 - Boeing - and the U.S. government reached a settlement over claims Boeing delivered military aircraft containing parts made of Russian-melted titanium rather than U.S. product, in violation of the Berry Amendment, 10 U.S.C. § 2533(a), which provides that a contractor may not purchase foreign titanium with appropriated funds. In addition, Boeing agreed to deliver

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without charge aircraft parts worth more than \$1.4 million. The case was settled with the Department of Justice under the False Claims Act, 31 U.S.C. § 3729-3733.

2013 - CDW-Government LLC agreed to pay a civil fine of \$5.66 million after it committed several violations, including selling products to the government that were manufactured in China and other countries in violation of the Trade Agreements Act.

2013, World Wide Technology paid a \$735,000 civil fine after it violated the Trade Agreements Act by falsely certifying that certain products sold to NASA and the Department of Defense were in compliance with the Act when in fact they had been manufactured in China and other countries.

See Federal Contractor Misconduct Database at the Project on Government Oversight website, available at <https://www.contractormisconduct.org>

The second count, Possession of Firearms by a Prohibited Person 18 U.S.C. § 922(g)(1), 18 U.S.C. § 924(a)(2) was a requirement of the government plea agreement. I am a convicted felon, but recently had my rights restored in the Commonwealth of Virginia (02/2021). I legally acquired the weapons over twenty five years ago under various circumstances when my company possessed a legitimate Federal Firearms License (FFL). I operated within an unwritten “state of Grace” with authorities. The weapons were kept in a secure manner and were never used in a commission of a crime. I fully understand that I should have disposed of these items years ago..

On October 15, 2020, I agreed to the government plea agreement, I plead guilty to;

1- count - Wire Fraud 18 U.S.C. § 1343 - Criminal No. GJH-20-171

1- count - Possession of Firearms by a Prohibited Person - Criminal No. GJH-20-368.

Since my guilty plea, of 10/15/2020, the sentencing has been delayed without a scheduled date due to the recent development of the FBI stating that all of the defense exhibits relating to my 25 years of service as a Confidential Information Asset with the FBI are “classified”. All of the government servers in which stored case related material must be “cleaned” and all future exhibit submissions must be approved by the FBI, prior to their submission.

Since my arrest, incarceration and 24 lock down home detention, I have lost my security business of 28 years, sacrificed a 30 year career as a security professional, and suffered severe financial hardship. All of my company merchandise has been confiscated, although I have submitted a motion for its return. I have been prohibited from any form of employment, due to the 24 hour lockdown status.

The collective actions of A.U.S.A. Elizabeth G. Wright represents an abuse of authority, violation of my 1st, 4th, 5th, 6th, 8th and 9th amendment rights, in reference as to how I have been treated by members of the Federal Criminal Justice System and how the search warrants were executed in related criminal case.

1st Amendment - prohibiting my speech in reference to testimony in the related criminal case due to the FBI deeming my defense statements as “classified” and restricted.

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4th Amendment - conducting search warrant in related criminal case in violation of FRCP-41(e)(2) the “Search Warrants” was intentionally vague and lacked the required specific “Particularity” as required. Property was confiscated that had no relation to the related criminal case

5th Amendment - confiscation of property without just compensation in the related criminal case.

6th Amendment - prohibiting witness testimony in the related criminal case due to the FBI deeming my defense statements as “classified” and restricted.

8th Amendment - imposing incarceration and excessive bail and 24 hour home confinement without just cause in the related criminal case.

9th Amendment - Presenting defamatory, misleading and false information to the court in the related criminal case, which resulted in biased, prejudice, and discriminatory harmful actions against my person and character

All of the activity documented in this complaint can be substantiated with the court record transcripts, submitted exhibits, submitted motions, and written statements.

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Since my house detention I enrolled with Southern New Hampshire University online degree program and have completed 92 credits toward a BA in Psychology and maintaining a 4.0 average.

I submit this complaint not just to bring light to my circumstances, but in an effort to attempt to expose and correct serious procedural, policy and behavioral institutional flaws of the system. It should be the obligation and duty of any government institution to ensure that it's members conduct themselves with honesty and adhere to high ethical standards and refrain from embracing biased, prejudiced and discriminatory agendas for the sole purpose of self enhancement and the exploitation of the rights of individuals who become subjects of the criminal justice system. In conclusion I thank you for your time and pray you find merit in this complaint.

**Search-Warrant Confiscated items and Damaged Property**  
**Lorton**

<b>9622 Hagel Circle , Lorton, Va. 22079 - Location -1</b>						
<b>No</b>	<b>Quantity</b>	<b>Item /Description</b>	<b>Confiscated / Returned</b>	<b>Condition</b>	<b>Unit Cost</b>	<b>Value USD</b>
1.	3	Level III -Ballistic Plates - Proto type -No NIJ labeling	Confiscated	New (Never Used)	\$165.00	\$595.00
2.	2	Level IV -Ballistic Plates - Proto type -No NIJ labeling	Confiscated	New (Never Used)	\$185.00	\$370.00
3.	3	Standard Black modular NIJ Level IIIA - vest w/ SEG Armor labeling	Confiscated	New (Never Used)	\$235.00	\$705.00
4.	4	Blue Navy Flotation Ballistic vest NIJ-IIIA (w/ SEG Armor labeling	Confiscated	New (Never Used)	\$685.00	\$2,740.00
5.	1	(Navy color Level IIIA vest **Personal defendant's property -Generic – no label or markings**	Confiscated	Used Good Condition	\$235.00	\$175.00
6.	1	Black Hi Cut Helmet - NII IIIA w/ rail system w/ SEG Armor Label	Confiscated	New (Never Used)	\$ 385.00	\$385.00
7.	1	ACH -Black Helmet NIJ-Level II - Unlabeled	Confiscated	New (Never Used)	\$365.00	\$365.00

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<b>8.</b>	<b>1</b>	Black -Shotgun Carry Case	Confiscated	Used Good Condition	<b>\$60.00</b>	<b>\$60.00</b>
<b>9.</b>	<b>18</b>	12 gauge & slug -Shells	Confiscated	Used Good Condition	<b>\$1.30</b>	<b>\$23.40</b>
<b>10.</b>	<b>12</b>	12 gauge .00-buck -Shells	Confiscated	Used Good Condition	<b>\$1.20</b>	<b>\$14.40</b>
<b>11.</b>	<b>15</b>	Less Lethal 12 Gauge rubber shot	Confiscated	Used Good Condition	<b>\$5.40</b>	<b>\$81.00</b>
<b>12.</b>	<b>1</b>	SPAS-12 Gauge Shotgun - SER #-AA18706	Confiscated	Used Good Condition	<b>\$1200.00</b>	<b>\$1,200.00</b>
<b>13.</b>	<b>1</b>	Red Black hawk Range Bag	Confiscated	Used Good Condition	<b>\$40.00</b>	<b>\$40.00</b>
<b>14.</b>	<b>1</b>	Premium Oak wood gun cleaning kit	Confiscated	Used Good Condition	<b>\$65.00</b>	<b>\$65.00</b>
<b>15.</b>	<b>1</b>	Standard soft case gun cleaning kit	Confiscated	Used Good Condition	<b>\$35.00</b>	<b>\$35.00</b>
<b>16.</b>	<b>1</b>	High Quality Headset Ear Protection	Confiscated	Used Good Condition	<b>\$65.00</b>	<b>\$65.00</b>
<b>17.</b>	<b>1</b>	Prescription Shooting glasses	Confiscated	Used Good Condition	<b>\$120.00</b>	<b>\$120.00</b>
<b>18.</b>	<b>15</b>	Paper Targets	Confiscated	New- Unused	<b>\$0.25</b>	<b>\$3.75</b>
<b>19.</b>	<b>1</b>	BlackPadded soft zippered Pistol Case	Confiscated	Used Good Condition	<b>\$25.00</b>	<b>\$25.00</b>

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<b>20.</b>	<b>1</b>	(Markarov) lMEZ 380APC S/N.BOH8322 w/ (2) 10 Rnd, Magazines (Custom Grips) Rear windage and elevation sights	Confiscated	Used Good Condition	<b>\$550.00</b>	<b>\$550.00</b>
<b>21.</b>	<b>99</b>	.380 American Eagle Rounds	Confiscated	New Condition	<b>\$1.10</b>	<b>\$108.90</b>
<b>22.</b>	<b>1</b>	Grey Padded soft zippered Pistol Case	Confiscated	Used Good Condition	<b>\$25.00</b>	<b>\$25.00</b>
<b>23.</b>	<b>1</b>	S & W Model 469 9mm S/N. TBT727O , w/ 2 magazines	Confiscated	Used Good Condition	<b>\$650.00</b>	<b>\$650.00</b>
<b>24.</b>	<b>62</b>	9mm American Eagle	Confiscated	New Condition	<b>\$0.90</b>	<b>\$55.80</b>
<b>25.</b>	<b>1</b>	Shooter Bench Block	Confiscated	Used Good Condition	<b>\$29.00</b>	<b>\$29.00</b>
<b>26.</b>	<b>2</b>	Green Padded soft zippered Pistol Case	Confiscated	Used Good Condition	<b>\$25.00</b>	<b>\$50.00</b>
<b>27.</b>	<b>6</b>	Uncle Mike's assorted holsters	Confiscated	Used Good Condition	<b>\$30.00</b>	<b>\$180.00</b>
<b>28.</b>	<b>4</b>	Rubber ear plugs set	Confiscated	Used Good Condition	<b>\$4.00</b>	<b>\$24.00</b>
<b>29.</b>	<b>1</b>	S&W 38 Special Sub nose 5 Rnd. Revolver S/N J125298 - w/ (2) 5 Rnd w/ Speed Loaders	Confiscated	Used Good Condition	<b>\$450.00</b>	<b>\$450.00</b>

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<b>30.</b>	<b>10</b>	.38 Special rounds	Confiscated	New Condition	<b>\$1.20</b>	<b>\$12.00</b>
<b>31.</b>	<b>1</b>	Samsung cell phone; black; carrier AT&T; marked "A" for identification	Confiscated	Used Good Condition	<b>\$80.00</b>	<b>\$80.00</b>
<b>32.</b>	<b>1</b>	Samsung cell phone; black; carrier AT&T; marked "B" for identification	Confiscated	Used Good Condition	<b>\$80.00</b>	<b>\$80.00</b>
<b>33.</b>	<b>1</b>	Pantech cell phone; green; carrier AT&T; marked "C" for identification	Confiscated	Used Good Condition	<b>\$40.00</b>	<b>\$40.00</b>
<b>34.</b>	<b>1</b>	BLU - Cell Phone—Active	Confiscated	Used Good Condition	<b>\$80.00</b>	<b>\$80.00</b>
<b>35.</b>	<b>1</b>	(1) Samsung Galaxy Note - Cell Phone S/N R28J227ZXZ / w/ Samsung Battery S/N BD1HC19VS/2~B -	Confiscated	Used Good Condition	<b>\$120.00</b>	<b>\$120.00</b>
<b>36.</b>	<b>1</b>	Samsung Galaxy Note S/N RF8642B39SP / w/ Samsung Battery S/N AA1K514DS/1-B	Confiscated	Used Good Condition	<b>\$120.00</b>	<b>\$120.00</b>
<b>37.</b>	<b>1</b>	Blu cellphone S/N 3080013016015695 - ** Not Active **	Confiscated	Used -Good condition	<b>\$90.00</b>	<b>\$90.00</b>
<b>38.</b>	<b>1</b>	Dell Latitude Laptop S/N 7QXF3R1 – Business Travel Laptop	Confiscated	Used -Good condition	<b>\$230.00</b>	<b>\$230.00</b>

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<b>39.</b>	<b>1</b>	Panasonic laptop, silver/black, Toughbook, SN: CF-52/UCBDBM	Confiscated	Used-Poor condition No Hard Drive	<b>\$120.00</b>	<b>\$120.00</b>
<b>40.</b>	<b>1</b>	(1) Computer Tower S/N 106687809 - **Small Business and home use computer	Confiscated	Used Good Condition	<b>\$280.00</b>	<b>\$280.00</b>
<b>41.</b>	<b>1</b>	External SSD S/N VTB60009261 ** Contains all SEG work Data,	Confiscated	Used Good Condition	<b>\$340.00</b>	<b>\$340.00</b>
<b>42.</b>	<b>1</b>	External HD S/N S 4730339 – Portable drive for Business travel	Confiscated	Used Good Condition	<b>\$160.00</b>	<b>\$160.00</b>
<b>43.</b>	<b>1</b>	Toshiba External Drive S/N 91C2C6717MC4	Confiscated	New -Good condition	<b>\$68.00</b>	<b>\$68.00</b>
<b>44.</b>	<b>1</b>	Rubber Armor case for the Dell Tablet that was returned	Confiscated	Used -Good condition	<b>\$40.00</b>	<b>\$40.00</b>
<b>45.</b>	<b>1</b>	DC- Power converter S/N 923563 /	Confiscated	Used Good Condition	<b>\$26.50</b>	<b>\$26.50</b>
<b>46.</b>	<b>1</b>	Box SEG business checks OAS Staff Federal Credit Union	Confiscated	New Good Condition	<b>\$28.00</b>	<b>\$28.00</b>
<b>47.</b>	<b>1</b>	Box SEG Business checks Navy Federal Credit Union	Confiscated	New Good Condition	<b>\$28.00</b>	<b>\$28.00</b>

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<b>48.</b>	<b>2</b>	(2 ) Boxes Arthur Morgan Check Books	Confiscated	New Good Condition	<b>\$28.00</b>	<b>\$28.00</b>
<b>49.</b>	<b>2</b>	Rolls - S.E.G. Inc. Product Labels - Gold	Confiscated	Good Condition	<b>\$6.00</b>	<b>\$12.00</b>
<b>50.</b>	<b>1</b>	Stack SEG Armor labels w/ NIJ III A serial numbers, and date of manufacture	Confiscated	New Good Condition	<b>\$28.00</b>	<b>\$28.00</b>
<b>51.</b>	<b>1</b>	Asia Security Group Company Stamp	Confiscated	New Good Condition	<b>\$30.00</b>	<b>\$30.00</b>
<b>52.</b>	<b>1</b>	(1) Dayrunner Telephone and address passwords -	Confiscated	Used Good Condition	<b>\$12.00</b>	<b>\$12.00</b>
<b>53.</b>	<b>1</b>	SEG Inc. Arthur Morgan business cards (stack)	Confiscated	New -Good condition	<b>\$68.00</b>	<b>\$68.00</b>
<b>54.</b>	<b>1</b>	Pantech cell phone; purple; carrier AT&T; marked "D" for identification	Returned	Damaged-Not bootable	<b>\$40.00</b>	<b>\$40.00</b>
<b>55.</b>	<b>1</b>	Samsung flip cell phone; black, silver, and blue; marked "E" for identification	Returned	Damaged-Not bootable	<b>\$60.00</b>	<b>\$60.00</b>
<b>56.</b>	<b>1</b>	Samsung cell phone; silver; carrier Cingular, Marked "F" for identification	Returned	Damaged-Not bootable	<b>\$80.00</b>	<b>\$80.00</b>
<b>Total equipment outstanding value amount confiscated and damaged</b>						<b>\$11,490.75</b>

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<b>Attic Damage</b>						
Attic was searched - rifled through Christmas decorations ,and empty suitcases and tore up floor insulation and broke the retaining wall during their search. (have photos) Requires replacement of the insulation.						
1.	<b>16</b>	R-30 Unfaced Fiberglass Insulation Batt 16 in. x 48 in. by Owens Corning		\$65.00 per roll	<b>\$1,040.00</b>	
2.	<b>1</b>	Installation			<b>\$1200.00</b>	
3.	<b>2</b>	Particle Board ¼" x 18" x 24"		7.00	<b>14.00</b>	
4	<b>1</b>	Labor to replace damaged panel			<b>\$175.00</b>	
<b>Total Amount to repair the Attic Damage</b>						<b>\$ 2,429.00</b>
<b>Total property and Damage repair combined amount</b>						<b>\$13,919.75</b>
	<b>Personal and Company property confiscated and requires to be returned to owner -no established value</b>					
1.	<b>2</b>	Banking documents folder "2016 Arthur Morgan	Confiscated	Good Condition	<b>Personal Property</b>	<b>Personal Property</b>
2.	<b>2</b>	Misc Business Docs Folder approx 20-30 documents	Confiscated	Good Condition	<b>Personal Property</b>	<b>Personal Property</b>
3.	<b>1</b>	2018 2019 W-2 Records -IRS	Confiscated	Good Condition	<b>Personal Property</b>	<b>Personal Property</b>
4.	<b>1</b>	Folder "2017 Individual income tax return" Arthur Morgan	Confiscated	Good Condition	<b>Personal Property</b>	<b>Personal Property</b>
5.	<b>1</b>	Folder - Itra Ventures Civil Law Suit Documents	Confiscated	Good Condition	<b>Personal Property</b>	<b>Personal Property</b>
6.	<b>2</b>	Passport 1- Expired 09/2010 2- Expired 09/2020.	Confiscated	Good Condition	<b>Personal Property</b>	<b>Personal Property</b>

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<b>7.</b>	<b>1</b>	2019 Louisa County Tax Bills – in the name of Susan Morgan	Confiscated	Good Condition	<b>Personal Property</b>	<b>Personal Property</b>
<b>8.</b>	<b>1</b>	Gilbert Small Arms Range Card – expired in 2005 -	Confiscated	Used Good Condition	<b>Personal Property</b>	<b>Personal Property</b>
<b>9.</b>	<b>1</b>	Arthur Morgan Armed Security Officer. ID card 2005.	Confiscated	Used Good Condition	<b>Personal Property</b>	<b>Personal Property</b>
<b>10.</b>	<b>1</b>	2006 NRA Membership Card	Confiscated	Used Good Condition	<b>Personal Property</b>	<b>Personal Property</b>

**Items Returned in Good Condition**

<b>1.</b>	<b>6</b>	Charging devices; (4) black, (2) grey,	Returned	Used-Good Condition	<b>N/A</b>	<b>N/A</b>
<b>2.</b>	<b>1</b>	(1)Patriot memory SD card -IGB	Returned	Used-Good Condition	<b>N/A</b>	<b>N/A</b>
<b>3.</b>	<b>1</b>	1) Micro SD adaptor	Returned	Used-Good Condition	<b>N/A</b>	<b>N/A</b>
<b>4.</b>	<b>1</b>	Hui feng joint-stock USB <b>-8 GB</b>	Returned	Used-Good Condition	<b>N/A</b>	<b>N/A</b>
<b>5.</b>	<b>1</b>	Unmarked USB Drive <b>-4 GB</b>	Returned	Used-Good Condition	<b>N/A</b>	<b>N/A</b>
<b>6.</b>	<b>1</b>	WCS USB -4 GB	Returned	Used-Good Condition	<b>N/A</b>	<b>N/A</b>

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<b>7.</b>	<b>1</b>	(1) Black USB <b>4 GB</b>	Returned	Used-Good Condition	N/A	N/A
<b>8.</b>	<b>1</b>	Micro Center adaptor and SD Card	Returned	Used-Good Condition	N/A	N/A
<b>9.</b>	<b>1</b>	SEG / reclact software USB <b>4 GB</b>	Returned	Used-Good Condition	N/A	N/A
<b>10.</b>	<b>1</b>	Emtec USB - <b>4 GB</b>	Returned	Used-Good Condition	N/A	N/A
<b>11.</b>	<b>1</b>	ScanDisk Micro SD Adaptor	Returned	Used-Good Condition	N/A	N/A
<b>12.</b>	<b>1</b>	HC micro SD White	Returned	Used-Good Condition	N/A	N/A
<b>13.</b>	<b>1</b>	Micro Center USB 3.0 32 GB	Returned	Used-Good Condition	N/A	N/A
<b>14.</b>	<b>1</b>	Lenovo charger	Returned	Used-Good Condition	N/A	N/A
<b>15.</b>	<b>1</b>	USB Cable	Returned	Used-Good Condition	N/A	N/A
<b>16.</b>	<b>1</b>	Dell Tablet, black with gold "S.E.G. Inc." label, Service Tag 4CC9R02	Returned	Used-Good Condition	N/A	N/A
<b>17.</b>	<b>1</b>	Pen voice recorder, w/ SD Card,	Returned	Used-Good Condition	N/A	N/A

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<b>18.</b>	<b>1</b>	Smiley button video camera	Returned	Used-Good Condition	N/A	N/A
<b>19.</b>	<b>1</b>	CAM-U7 -Covert body Worn Audio/video Camera	Returned	Used-Good Condition	N/A	N/A
<b>20.</b>	<b>2</b>	64 GB Micro SD Card	Returned	Used-Good Condition	N/A	N/A
<b>21.</b>	<b>3</b>	Micro SD Card	Returned	Used-Good Condition	N/A	N/A

**Search Warrant Confiscated items - Springfield, Va. -Warehouse**

The “Search Agents” conducted their activity in an excessive unprofessional manner. Violated the civil rights of other tenants by declaring a false “Bomb Scare” to illegally clear the area and inhibit the other tenants from conducting their normal legal activity within the facility. It was reported by Mr. Paul Cabrera (former S.E.G Inc. employee and government witness). Mr. Cabrera was informed by other tenants who were present in the facility at the time when the Search Agents appeared on the scene. This was done to force the other tenants out of the facility, so the Agents could conduct their Search and Seizure activity without anyone witnessing their activity. It was deceptive and violated the 4th amendment rights of the other legal tenants. This was illegal, unethical and unprofessional behavior.

35 pallets of Riot Gear intended to be shipped to State Dept. warehouse in Laredo Tx. Boxed palletized and shrink wrapped - Itemized below

No.	Quantity	Item	Unit cost	Total Value
1.	126	X-Large Duty Bag for Riot Gear	\$40.00	\$5,040.00
2.	69	Riot Gear duty Belts	\$8.50	\$586.50
2.	43	Anti Riot Gear Suit -Small	\$205.00	\$8,815.00
3.	166	Anti Riot Gear Suit -Medium	\$205.00	\$34,030.00
4.	130	Anti Riot Gear Suit -Large	\$205.00	\$26,650.00

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<b>5.</b>	38	Anti Riot Gear Suit -X-Large	\$205.00	\$7,790.00
<b>6.</b>	43	Anti Riot Helmet w/ shield -Small	\$62.50	\$2,687.50
<b>7.</b>	154	Anti Riot Helmet w/ shield -Medium	\$62.50	\$9,625.00
<b>8.</b>	118	Anti Riot Helmet w/ shield -Large	\$62.50	\$7,375.00
<b>9</b>	38	Anti Riot Helmet w/ shield -X-Large	\$62.50	\$2,375.00
<b>10.</b>	152	Anti Riot Shield 900 mm x 500 mm x 3mm	\$78.00	\$11,856.00
<b>11.</b>	1	Hydraulic Hand Pallet Jack -Used	\$350.00	\$350.00
<b>12.</b>	1	6" x 3" folding staging table	\$70.00	\$70.00
<b>13.</b>	<b>1</b>	1 Set of shipping Documents	<b>N/A</b>	<b>N/A</b>
<b>Total value of all items confiscated</b>				<b>\$117,250.00</b>

### **Search Warrant Confiscated and Damaged items - Louisa, Va.**

<p>All of the items confiscated below were from the camper trailer, and the 1998 Chevrolet pickup truck which was the personal property of Paul Cabrera. Mr. Cabrera resided in the trailer from 2017 -2018. - The Search Agents were fully aware that the items confiscated had no connection to the related criminal case. Mr. Paul Cabrera is a licensed and registered Armed Security Officer with Virginia State DCJS</p>			
No .	Item - description	Confiscated /Returned	Cost of Damaged or Value of item
1.	<p>1- Black Ballistic Helmet -w/ 7 pads,head strap, -Level IIIA (Illegal confiscation) in front seat of 1998 Chevrolet Blue Pickup truck registered to Paul Cabrera</p> <p>The truck side passenger window was broken during the execution of the search warrant. The helmet that is listed on the confiscation sheet. The helmet is the personal property of Mr. Paul Cabrera,</p>	Confiscated	\$385.00

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	and was illegally confiscated. It had no label or markings.		
2.	Cost to replace the broken window damaged by Federal Agents prior to the executed search warrant	<b>Confiscated</b>	<b>\$560.00</b>
3.	1- Dome Security Cam Model PP2950X27, S/N -832140503X0001	<b>Confiscated</b>	<b>\$385.00</b>
4.	12 - Rounds of 9 mm. Ammunition (\$1.10 per round)	<b>Confiscated</b>	<b>\$ 13.20</b>
5.	1- 30 Rnd SHK Extended Mag. for 9 mm.	<b>Confiscated</b>	<b>\$29.00</b>
6.	1- 1GB SD Patriot memory	<b>Confiscated</b>	<b>\$8.00</b>
7.	1-10-GB Thumb Drive	<b>Confiscated</b>	<b>\$8.00</b>
8.	1- Plastic bin 24" x 24" 18" - full of personal documents of Mr. Paul Cabrera	<b>Confiscated</b>	<b>\$24.00</b>
<b>Total Value of confiscated and damaged property</b>			<b>\$1,412.20</b>
9.	1-Photo of sheet with combinations of DMV registrations for Paul Cabrera	<b>Confiscated</b>	<b>Persona; Property</b>
10.	1- DMV document for S.E.G. Inc.	<b>Confiscated</b>	<b>Personality Property</b>
11.	1- Navy Federal Credit Union receipt for \$20,574.75 (To who?)	<b>Confiscated</b>	<b>Persona; Property</b>
12.	Navy Federal Credit Union Check for \$200.00 to DHS	<b>Confiscated</b>	<b>Personal Property</b>
13.	1- Silver & Black Dash Camera w/ SD card, model no. CDR-840 -32 GB Micro Converter Micro SD S/N -J5033028560	<b>Returned</b>	<b>Personal Property</b>
14.	1- Seagate Hard Drive 250GB -S/N-5RYOSJHJ	<b>Returned</b>	<b>Personal Property</b>
15.	1- Blu cell phone - non operational	<b>Returned</b>	<b>Personal Property</b>

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**Search-Warrant Confiscated items and Damaged Property -Dickerson Storage**

No.	Item	Confiscated or Damaged / Returned	Value
1.	Glass Table Top 24" x 48"	Totally destroyed in broken particles	\$800.00
2.	LP Vinyl record collection approx. 120 records - 1950 and 1970 collection	Damaged - may classic albums are broken	\$1600.00
3.	500 year old Antique Chinese Screen Gold leaf inlay front and ebony inlaid with stones on rear 5 panels - 14" x 72" X5	Confiscated but not listed on the confiscation list	\$8,000.00

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<b>4.</b>	(1) Pelican transport case - wheeled 48" x 24" x 32" w/ trade show display posters	Returned	(\$160.00)
<b>5.</b>	Trade Show demo - non working modular Cell intercept monitoring system,	Returned	(\$800.00)
<b>6.</b>	Trade Show demo - non working SAR (Search and Rescue GSM Tracking unit) Man Pack Pelican case w/ 1 patch antennas, 1-omni Antenna.	Returned	(\$1,400.00)
<b>7.</b>	1- 32" Flat Screen color monitor	Confiscated but not listed on the confiscation list	\$400.00
<b>8..</b>	Trade show display 120" x 72"	Returned	(\$700.00)
<b>9.</b>	1 - Black wheeled tool box with approx. \$800.00 worth of technician tools	Confiscated but not listed on the confiscation list	\$860.00
<b>10.</b>	1- Black and yellow 2 tier tool box with \$200.00 worth of technician tools.	Confiscated but not listed on the confiscation list	\$260.00
<b>11</b>	2- License Plate Recognition camera	Returned	(\$1,400.00)
<b>Total Amount</b>			<b>\$11,920.00</b>

**Personal Property Confiscated -Documents**

<b>1.</b>	1- SEG Armor Ballistic vest - (Agent claimed made in Ningbo China) This storage locker did not contain any body armor it was Defendant's personal furniture, documents, library
<b>2.</b>	3) - 24 DVD's - Blank ( <b>Returned</b> )
<b>3.</b>	1- Folder -containing official application (no explanation as to for what purpose) - 1- Birth Certificate for Arthur Morgan, 1- 1992 - Parole Release for Morgan and parole release conditions, 1- "Art " of achievement. (Requires further detailed explanation by the Agents)
<b>4.</b>	Envelope containing "Court transcripts from 1982 Appeal" for Arthur Morgan - (No reference to which case - no relation to current "Criminal Investigation")

<b>None of the property and documents confiscated have any connection to the current case</b>
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**S.E.G. Inc. Business Worth  
Based on average of Annual Gross Receipts for past five years**

<b>Year</b>	<b>S.E.G. Inc. - IRS - 1120</b>	<b>Annual Gross Receipts</b>
<b>2019</b>	<b>S.E.G. Inc. Gross Income - IRS - 1120</b>	<b>\$362,817.00</b>
<b>2018</b>	<b>S.E.G. Inc. Gross Income - IRS - 1120</b>	<b>\$403,570.00</b>
<b>2017</b>	<b>S.E.G. Inc. Gross Income - IRS - 1120</b>	<b>\$317,299.00</b>
<b>2016</b>	<b>S.E.G. Inc. Gross Income - IRS - 1120</b>	<b>\$496,732.00</b>
<b>2015</b>	<b>S.E.G. Inc. Gross Income - IRS - 1120</b>	<b>\$418,687.00</b>
<b>Add total Gross Receipts for the past five years and divide by 5 The average is the estimated value of S.E.G. Inc.</b>		
<b>Estimated Value of S.E.G. Inc prior to company shut down</b>		<b>\$399,821.00</b>

A.U.S.A. Elizabeth Wright intentionally forced the closing of S.E.G. Inc. prior to the Defendant's conviction, violating basic rule of law of presumption of innocence prior to conviction. She demonstrated malice and discrimination against the Defendant by embracing a false narrative that the Defendant was operating a criminal enterprise. She presented false and misleading statements to the Magistrate Court for advocating incarceration of the Defendant that would ensure the closure of S.E.G. Inc. business operation, in violation of the 1987 Bail Reform Act.